

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

2023 JAN 11 PM 2:11

Mamie JACKSON  
3700 N. Main St  
Columbia, SC 29203

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Central Midlands Regional  
Transit Authority  
3613 Lucius Road Columbia, S.C. 29202

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. \_\_\_\_\_  
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No  
(check one)

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Mamie JACKSON</u>
Street Address	<u>3700 N. Main St</u>
City and County	<u>Columbia, SC 29203</u>
State and Zip Code	<u>Richland County</u>
Telephone Number	<u>803-629-6975</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>Central Midlands</u>
Job or Title (if known)	<u>Regional Transit Authority</u>
Street Address	<u>3613 Lucius Road</u>
City and County	<u>Columbia, Richland County</u>
State and Zip Code	<u>S.C. 29202</u>
Telephone Number	<u>803-255-7100</u>

**Defendant No. 2**

Name	_____
Job or Title (if known)	_____
Street Address	_____
City and County	_____
State and Zip Code	_____
Telephone Number	_____

**Defendant No. 3**

Name	_____
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Job or Title \_\_\_\_\_  
 (if known)  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 Defendant No. 4  
 Name \_\_\_\_\_  
 Job or Title \_\_\_\_\_  
 (if known)  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Americans with Disabilities Act and  
Discrimination based on race, economic  
status under Civil Rights Act of 1964

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_.

b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

### 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

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### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

No notice was given to riders of the CMRTA that the company was planning to move the Transit station at Laurel and Sumter to River Drive and Lucius Road. Additional pages along with example of past public notice

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The damage will be out in the elements with no shelter during inclement weather. No bathroom facilities and no prior knowledge of how the system will work. Feelings that come from being treated as a second class citizen because of my race and economic standing. Request an Emergency Injunction to stop this unlawful act.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: January 11, 2023

Signature of Plaintiff Mamie Jackson

Printed Name of Plaintiff Mamie Jackson

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Address \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_

The Central Midlands Regional Transit Authority (CMRTA) runs the local bus company. The hub of the system, The Transit, is located at Laurel and Sumter downtown. CMRTA has 32 buses and at least half pass through the Transit.

The Transit is a physical building ~~building~~ with indoor bathrooms that are handicapped able and with seating provided for shelter from the elements.

CMRTA announced over the audio system on the 101 bus I was riding last Wednesday the new changes would go into effect ~~December~~<sup>January</sup> 15, 2023. No new schedules were provided on the bus or at the Transit.

On the news (ABC) announced that the CMRTA announced that the



The Transit would be closed and moved to Lucius and River Drive.

The River Drive is a large paved lot with bus stop stations for buses and seating for approximately 5-10 persons. There is no physical structure nor indoor bathroom facilities.

The CMRTA announced on the 01 that new schedules could be found on their web site.

The Transit riders are at least 90% Black and working class. It appears the Transit has been moved because of our race. A number of years ago bus seats were removed from the Transit sidewalk and a number of other shelters to prohibit the Homeless from using them. I have had to stand waiting for the bus since then. Sometimes I have had



to wait in the rain because the entire shelter was removed. The stop at Gervais ~~on the~~ assembly was fenced in leaving no space for us to shelter from the rain from the roof awning. now have a place to sit.

It and others will be greatly inconvenienced and handicapped by decreasing our available access for multiple uses of downtown, business, banking, and social facilities and easily access for bus transfer to areas for shopping, doctor appointments on the same day.

Workers who depend on the bus have had no advancement plan for them to plan getting to work.

The River Drive Lot has a traffic light installed at River and Lucius Road indicating to me long range planning was done for this move.

No notice was given to the ridership of the planned removal of the Transit from downtown.

CMRTA has stated the move is for elimination of traffic downtown.

CMRTA is not and does not include traffic control as a mission. That is the job of the City of Columbia. Clearly parties have been consulted and I as a rider along with others was not included.

I believe this discrimination by CMRTA is because I am Black and working class. Federal funds have been used to discriminate against me.

MAMIE JACKSON  
3700 N. Main Street  
Columbia, S.C. 29203